# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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In re:	j	Chapter 11
FREE SPEECH SYSTEMS LLC,	)	Case No. 22-60043
Debtor.	)	
	)	

# AMENDED DECLARATION OF ELIZABETH FREEMAN IN SUPPORT OF THE APPLICATION TO RETAIN THE LAW OFFICE OF LIZ FREEMAN, PLLC AS CO-COUNSEL FOR THE SUBCHAPTER V TRUSTEE

The undersigned proposed attorney for the above-captioned debtor and debtor-inpossession submits this verified statement of disinterestedness pursuant to Bankruptcy Rule 2014(a).

- 1. My name is Elizabeth Freeman. I am over the age of 18 years, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. Each and every statement contained herein is true and correct.
  - 2. I am an attorney admitted to practice in the State of Texas and in this Court.
- 3. I am a member of The Law Office of Liz Freeman, PLLC (the "<u>Firm</u>"). The Firm's mailing address is PO Box 61209, Houston, TX 77208-1209. The Firm's telephone number is 832-779-3580. My e-mail address is liz@lizfreemanlaw.com.
- 4. In conjunction with the Trustee's retention of the Firm, I searched of the Firm's conflict system for each of the Debtor, the Debtor's creditors, affiliates, and insiders, principals of the Debtor, officers and directors of the Debtors (the "Potential Parties in Interest").
- 5. The Firm may represent other affiliates whose identities and affiliation did not show up on the conflicts system. It is possible that there are creditors whom the Debtor did not identify

in their records that are clients of the Firm. I did not find that I nor my Firm had connections with the Debtor, its creditors and their current and former officers, directors, and professionals.

6. The Firm was sent \$100,000 from FSS on December 22, 2023. An additional \$50,000 was sent to the Firm by FSS on January 26, 2024. These Funds were deposited into and remain in the Firm's IOLTA account. The Firm has not been paid for any work in this case.

### A. The Firm's Prior Relationship to the Trustee

- 6. My prior firm, Jackson Walker, LLP and the Trustee entered into the Engagement on October 11, 2022. Jackson Walker continues to be engaged by the Trustee. I am primary counsel for the Trustee. Jackson Walker assists the Trustee on discovery matters related to the Trustee's investigation. The two firms are careful to avoid duplication of effort. The Firm does not bill the estate for discovery work addressed by Jackson Walker. The Firm does utilize the information and materials obtained in discovery in preparation of the Trustee's investigation reports.
- 7. The Firm has no other representation of the Trustee. The Trustee and I have known one another for a number of years and have worked on matters as opposing counsel and also as counsel representing parties with common interests. On occasion, I refer potential clients to the Trustee.

## B. <u>Current Clients of the Firm that are Creditors of the Debtor</u>

8. The Firm does not represent entities or affiliates of creditors of the Debtor.

#### C. Creditors of the Debtor that are Adverse to the Firm's Clients

8. The Firm did not find that it represents, or has represented in the past, clients that are adverse or potentially adverse to creditors (or affiliates of creditors) of the Debtor.

#### D. The Firm's Connections with the Debtor, Officers, and Professionals

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9. Neither I nor the Firm have had any connection with the Debtor, insiders or

affiliates of the Debtor, the Debtor's creditors, any other party in interest, their respective attorneys

and accountants, the United States Trustee, or any other person employed in the Office of the

United States Trustee. I believe that the Firm and I am a are disinterested persons within the

meaning of 11 U.S.C. § 101(14), to the best of my knowledge.

E. <u>Statement Regarding United States Trustee Guidelines</u>

10. The Firm shall apply for compensation for professional services rendered and

reimbursement of expenses incurred in connection with the Debtor's chapter 11 case in compliance

with sections 330 and 331 of the Bankruptcy Code, and applicable provisions of the Bankruptcy

Rules, Bankruptcy Local Rules, and any other applicable procedures and orders of the Court.

11. The Firm will periodically review both the changes in identifiable parties in interest

of the Debtor and clients of the Firm as such information becomes available or relevant. I will

update this disclosure as appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true

and correct.

Executed February 1, 2024

/s/ Elizabeth C. Freeman

Elizabeth C. Freeman

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#### Schedule 1

# Schedule of Searched Parties/Terms Patrick McGill Reynal

Elevated Solution ADP Free Speech Cicak

Greenair
Christopher Sadowski
Copycat Legal

Richard Coan
Alex Woolverton
Stephen Lemmon

Copycat Legal
Edgecast
Atomial
Stephen Echimon
Melissa Haselden
Anthony Gucciardi

Ready Alliance
Cloudfare
Cloudfare
Getty Images
Jacquelyn Blott
RatsMed
Patrick Riley
Blue Ascension
Neil Heslin
Scarlett Lewis
Leonard Pozner

Rapid Med

Joel Skousen

David Joke

Marcel Fontaine

David Icke
Icke Book
Ickonic

Commerce Con

WWCR

Paul Watson

Jacqueline Barden

Mark Barden

Nicole Hockley

Ian Hockley

Jennifer Hensel

Brennan Gilmore
Civil Rights Clinic
CustomTattoo

Jennifer Hensel
Donna Soto
Carlee Soto Parisi
Carles M. Soto

AT&T
Justin Lair
PQPR
David Ross Jones

Carlos M. Soto
Jillian Soto-Marino
William Aldenberg
William Sherlach

Carol Jones
Ally Bank
Wisconsin Department
Texas Comptroller

Robert Parker
Joey Delassio
Elevated Solutions
Ray Battaglia

American Express
Shelby Jordan

Bradley Reeves
Amex

Vickie Driver Texas Comptroller

Travis County

Security Bank of Crawford

Ha Nguyen

Security Bank of Crawford
Reeves Law

Ha Nguyen
Ally Bank

Sweetwater Holdings AIS Portfolio